

Abran E. Vigil, Esq.
Nevada Bar No. 7548
Maria A. Gall, Esq.
Nevada Bar No. 14200
Lindsay Demaree, Esq.
Nevada Bar No. 11949
Kyle A. Ewing, Esq.
Nevada Bar No. 14051
BALLARD SPAHR LLP
1980 Festival Plaza Drive, Suite 900
Las Vegas, Nevada 89135
Telephone: (702) 471-7000
Facsimile: (702) 471-7070
vigila@ballardspahr.com
gallm@ballardspahr.com
demareel@ballardspahr.com
ewingk@ballardspahr.com

Attorneys for JPMorgan Chase Bank, N.A.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JPMORGAN CHASE BANK, N.A.,

Plaintiff,

vs.

SFR INVESTMENTS POOL 1, LLC, a
Nevada limited liability company; SEVEN
HILLS MASTER COMMUNITY
ASSOCIATION, a Nevada non-profit
corporation; and VENANCIO H. REYES,
JR., an individual,

Defendants.

SFR INVESTMENTS POOL 1, LLC, a
Nevada limited liability company

Counterclaimant/Cross-Claimant,

vs.

Case No.: 2:17-CV-00321-GMN-GWF

**STIPULATION AND ORDER TO
EXTEND SCHEDULING ORDER
DEADLINES BY 60 DAYS**

(First Request)

JPMORGAN CHASE BANK, N.A.;
MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC. AS
NOMINEE BENEFICIARY FOR
COUNTRYWIDE HOME LOANS, INC., a
New York corporation; REAL TIME
RESOLUTIONS, INC.,

Counter/Third-Party/Cross-
Defendants.

Pursuant to LR IA 6-1 and LR 26-4, Plaintiff/Counter-Defendant JPMorgan Chase Bank, N.A. ("Chase"), Defendant/Counterclaimant/Cross-Claimant SFR Investments Pool 1, LLC ("SFR"), and Defendant Seven Hills Master Community Association ("Seven Hills"), by and through their respective counsel of record, stipulate and request that this Court extend discovery and dispositive motion deadlines in the above-captioned case for 60 days, to permit the parties to complete party depositions, and specifically the deposition of Chase, whose designated witness underwent significant surgery in December, from which she will not have recuperated until at least the end of January or beginning of February 2018. The parties have conferred and agree that this brief extension is the most reasonable way to complete discovery in this case, including so that Chase's designated witness has sufficient time to attend to necessary medical treatment and recuperate before traveling to Las Vegas for her depositions in not only this action but numerous other lawsuits between Chase and SFR involving homeowners' association foreclosure sales.

This is the parties' first request for an extension to the scheduling order deadlines, which were submitted in compliance with LR 26-1. The parties make this request in good faith and not for purposes of delay.

A. Discovery Completed to Date

To date, Chase has served the following discovery: its initial disclosure of documents and witnesses and its initial expert disclosure.

To date, SFR has served the following discovery: its initial disclosure of

documents and witnesses and notice of Rule 30(b)(6) deposition of Chase and notice of deposition of Mortgage Electronic Registration Systems, Inc.

Moreover, on December 20, 2017, the Parties filed their interim status report. *See* ECF No. 35.

B. Specific Description of Discovery that Remains to be Completed

SFR has noticed a Rule 30(b)(6) deposition of Chase for January 11, 2017. As discussed below, however, the parties seek to reschedule Chase's deposition to occur after the current discovery cutoff of February 22, 2018.¹ Chase plans to notice depositions of SFR, Seven Hills, and non-party Alessi & Koenig, LLC. Chase and SFR are currently preparing written discovery to be served on each other. Chase is also preparing written discovery to be served on Seven Hills.

C. Good Cause Exists for the Requested Extension

SFR has noticed Chase's deposition for January 11, 2018, but Chase's Rule 30(b)(6) designee is unavailable on this date because the designee will be recovering from a significant surgery she underwent in December. It is not known at this point when her doctor will clear her to fly again, and she may be unable to fly until the end of January or beginning of February 2018. The parties have met and conferred about rescheduling Chase's deposition in this and other similar lawsuits to the week of March 19, 2017. Although it is anticipated that Chase's designated witness should be able to fly by February 2018, the parties are unable to schedule her deposition in February as the witness will be testifying in numerous other lawsuits that month (the rescheduling of which was also necessitated by her surgery.)

This is the parties' first request to extend the discovery period in this case, and they seek the extension so that Chase's designated witness may have an opportunity to receive necessary medical treatment and recover from the same, which treatment

¹ The parties further reserve their rights to meet and confer and, if necessary, engage in motion practice regarding any discovery issues that may arise.

1 and recovery were not anticipated at the time the parties filed their first proposed
 2 scheduling order. The parties have diligently engaged in discovery to date, met and
 3 conferred regarding the requested extension and scheduling of outstanding discovery
 4 items, and seek this extension in good faith.

5 **D. Proposed Discovery Deadlines**

6 The parties request an order extending the close of discovery, the deadline to
 7 file dispositive motions, and the deadline to file a pre-trial order by 60 days.

8 Event	Current Deadline²	New Deadline
9 Close of Discovery	February 22, 2018	April 23, 2018
10 Dispositive Motions	March 26, 2018	May 25, 2018
11 Pre-Trial Order	April 25, 2018	June 25, 2018

12
 13 *[Continued on the following page]*

27 ² See Scheduling Order, ECF No. 16.

This extension is not requested for purposes of delay and is reasonable and necessary given the good cause set forth above.

IT IS SO STIPULATED.

Dated: January 5, 2018

KIM GILBERT EBRON

BALLARD SPAHR LLP

By: /s/ Diana S. Ebron

By: /s/ Maria A. Gall

Diana S. Ebron, Esq.
Nevada Bar No. 10580
Karen L. Hanks, Esq.
Nevada Bar No. 9578
Jacqueline A. Gilbert, Esq.
Nevada Bar No. 10593
7625 Dean Martin Drive, Ste 110
Las Vegas, Nevada 89139-5974

Abran E. Vigil, Esq.
Nevada Bar No. 7548
Maria A. Gall, Esq.
Nevada Bar No. 14200
Lindsay Demaree, Esq.
Nevada Bar No. 11949
Kyle A. Ewing, Esq.
Nevada Bar No. 14051
1980 Festival Plaza Drive, Suite 900
Las Vegas, Nevada 89135

Attorneys for SFR Investments Pool 1, LLC

Attorneys for JPMorgan Chase Bank, N.A.

BOYACK ORME & ANTHONY

By: /s/ Patrick Orme

Edward D. Boyack, Esq.
Nevada Bar No. 5229
Patrick Orme, Esq.
Nevada Bar No. 7853
7432 West Sahara Avenue, Suite 101
Las Vegas, Nevada 89117

Attorneys for Seven Hills Master Community Association

ORDER

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: January 8, 2018

CERTIFICATE OF SERVICE

I certify that on January 5, 2018, and pursuant to Federal Rule of Civil Procedure 5, true copies of the foregoing **STIPULATION AND ORDER TO EXTEND SCHEDULING ORDER DEADLINES BY 60 DAYS** was sent to the following parties via U.S. Mail at the following addresses:

Real Time Resolutions, Inc.
c/o The Corporation Trust Company of Nevada
701 S. Carson St., Suite 200
Carson City, NV 89701

Venancio Reyes, Jr.
1850 E. Serene Ave., Suite 101
Las Vegas, NV 89123

/s/ Mary Kay Carlton
An employee of BALLARD SPAHR LLP

BALLARD SPAHR LLP
1980 FESTIVAL PLAZA DRIVE, SUITE 900
LAS VEGAS, NEVADA 89135
(702) 471-7000 FAX (702) 471-7070